

are identical to the statements made previously by Applicants' attorney.

The Examiner is requested to note, in particular, the statements in paragraph 20 of the TECHNICAL DECLARATION that make clear the following:

- (a) Schwuttke et al. neither discloses nor suggests:
  - (1) generating the grid as a direct result of data values (as specified by claims 1, 2, 5, 6, 9, 13 and 14) or,
  - (2) a mathematical matrix generated as a direct result of data values (as specified by claims 3, 7, 11, and 15).
- (b) The Examiner has not pointed out where, in Schwuttke et al., there is a specific disclosure of such features.
- (c) In describing the construction and operation of Schwuttke et al., the Examiner has used words that are different from the words in the rejected claims and has failed to relate the words that she has used to the words of the claims to support the anticipation rejection based on Schwuttke et al. As a result, the words of the Examiner do not indicate to one skilled in the art that Schwuttke et al. discloses or suggests:
  - (1) "generating a grid based on a plurality of data values" (as called for by claims 1, 2, 5, 6, 9, 13, and 14), and
  - (2) "extracting a plurality of data values associated with a mathematical matrix to generate a geometric representation" ( as called for by claims 3, 7, 11, and 15).

Instead of identifying:

- (a) where in Schwuttke et al. there is a disclosure of generating a grid as a direct result of data values, as defined by claims 1, 2, 5, 6, 9, 13, and 14, rather than data values being located in a grid subsequent to formation, in an arbitrary manner, of the grid as in Schwuttke et al., and
- (b) where in Schwuttke et al. there is a disclosure of the mathematical matrix generated as a direct result of data values, as defined by claims 3, 7, 11, and 15, rather than the data values being located in a matrix subsequent to formation, in an arbitrary manner, of the matrix as in Schwuttke et al.,

the Examiner has used words which are not on point and has failed to explain how these words used by the Examiner have the same meaning as the words specified by the rejected claims.

In making a rejection under Section 102, the single reference that is the basis for the rejection must disclose each and every element, detail, feature, and aspect of the invention that is specified by the rejected claims that define the invention. If the rejection of the claims is maintained, the Examiner is requested to:

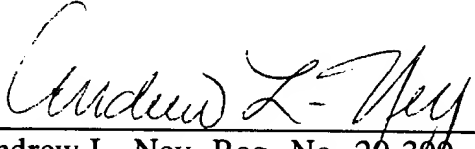
- (1) present arguments that refute the statements set forth in the TECHNICAL DECLARATION, and
- (2) identify where in Schwuttke et al. there is a disclosure of:
  - (a) generating the grid as a direct result of data values, as specified by claims 1, 2, 5, 6, 9, 13 and 14, and

- (b) the mathematical matrix generated as a direct result of data values, as specified by claims 3, 7, 11, and 15.

If the Examiner is unable to do so, this application should be allowed.

Respectfully submitted,

RATNER & PRESTIA

  
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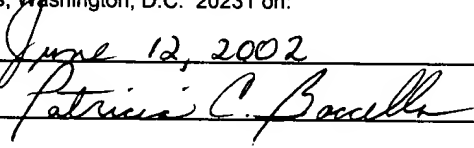
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Dated: June 12, 2002

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The Assistant Commissioner for Patents is hereby authorized to charge payment to Deposit Account No. **09-0456 (IBM Corporation)** of any fees associated with this communication.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231 on:

  
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June 12, 2002  
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Patricia C. Bonilla